

CUPA File



California Environmental Protection Agency

Air Resources Board • Department of Pesticide Regulation • Department of Toxic Substances Control
Integrated Waste Management Board • Office of Environmental Health Hazard Assessment
State Water Resources Control Board • Regional Water Quality Control Boards



Alan C. Lloyd, Ph.D.
Agency Secretary

Arnold Schwarzenegger
Governor

Certified Mail: 7000 0600 0027 1155 2871

March 28, 2006

Mr. Jeff Pinnow, Senior Hazardous Materials Specialist
Yolo County Environmental Health
10 Cottonwood Street
Woodland, California 95695

Dear Mr. Pinnow:

The California Environmental Protection Agency (Cal/EPA), Office of Emergency Services, Office of the State Fire Marshal, Department of Toxic Substances Control, and the State Water Resources Control Board conducted a program evaluation of Yolo County Environmental Health's Certified Unified Program Agency (CUPA) on January 31, 2006 through February 1, 2006. The evaluation was comprised of an in-office program review and field inspections. The state evaluators completed a Certified Unified Program Agency Evaluation, Summary of Findings with your agency's program management staff, which includes identified deficiencies, preliminary corrective actions and timeframes. Two additional evaluation documents are the Program Observations and Recommendations and the Examples of Outstanding Program Implementation. I have reviewed the enclosed copy of the Summary of Findings and I find that Yolo County Environmental Health's program performance is satisfactory with some improvement needed. Cal/EPA's Unified Program staff will coordinate with your agency to track the correction of any identified deficiencies over the time frame and schedule included in the Summary of Findings.

Thank you for your continued commitment to the protection of public health and the environment. If you have any questions or need further assistance, you may contact Jim Bohon, Manager, Cal/EPA Unified Program at (916) 327-5097 or jbohon@calepa.ca.gov.

Sincerely,

Don Johnson
Assistant Secretary
California Environmental Protection Agency

Enclosures
cc: See next page

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cc: Mr. Jeff Pinnow, Hazardous Materials Specialist (Sent Via Email)
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STATE OF CALIFORNIA
ENVIRONMENTAL PROTECTION AGENCY



Alan C. Lloyd, Ph.D.
Agency Secretary

CERTIFIED UNIFIED PROGRAM AGENCY EVALUATION
SUMMARY OF FINDINGS

Arnold
Schwarzenegger
Governor

CUPA: Yolo County Environmental Health

Evaluation Date: January 31, 2006 to February 1, 2006

EVALUATION TEAM

Cal/EPA: Kareem Taylor

SWRCB: Marcele Christofferson

OES: Brian Abeel

DTSC: Mark Pear

OSFM: Francis Mateo

This Summary of Findings includes the deficiencies identified during the evaluation, observations and recommendations for program improvement, and examples of outstanding program implementation activities. The evaluation findings are preliminary and subject to change upon review by state agency and CUPA management. Questions or comments can be directed to Kareem Taylor at (916) 327-9557.

	<u>Deficiency</u>	<u>Preliminary Corrective Action</u>	<u>Timeframe</u>
1	<p>The CUPA is not inspecting all Cal/ARP facilities subject to the surcharge on a triennial basis. In FY 04/05, the problem with inspection frequencies has been due to the amount of time spent consulting with USEPA and DOT regarding Valero Refining Company's storage of millions of gallons of Butane in railroad cars in the County. Inspections for the previous fiscal years are as follows:</p> <ul style="list-style-type: none">• In FY 04/05, 1 out of 14 businesses was inspected.• In FY 03/04, 3 out of 16 businesses were inspected.• In FY 02/03, 0 out of 16 businesses was inspected.	<p>The CUPA will inspect Cal/ARP facilities subject to the surcharge on a triennial basis.</p>	<p>January 1, 2007</p>
2	<p>The CUPA does not regularly evaluate the City of West Sacramento Fire Department and the County Agricultural Commissioner in their implementation of the Unified Program.</p>	<p>The CUPA shall evaluate its participating agencies on an annual basis at the time of the Self-Audit pursuant to Section 15280, or as necessary to maintain standards required in Health</p>	<p>January 1, 2007</p>

**Certified Unified Program Agency (CUPA)
Evaluation Summary of Findings**

		and Safety Code, Chapter 6.11.	
	<p>The CUPA is not conducting inspections with a frequency that is consistent with its Inspection and Enforcement Plan and with the inspection of other program elements. The CUPA has not inspected all 589 hazardous waste generators that have been identified by the CUPA. The last three annual inspection summary reports indicate the following:</p> <ol style="list-style-type: none"> 1) 455 hazardous waste generators were identified in Fiscal Year 02/03 of which 138 (30%) were inspected. 2) 519 hazardous waste generators were identified in Fiscal Year 03/04 of which 125 (24%) were inspected. 3) 589 hazardous waste generators were identified in Fiscal Year 04/05 of which 186 (31%) were inspected. 		
3	<p>The CUPA has inspected approximately 76% of all known facilities generating hazardous waste over the past three fiscal years. In addition, there is a difference of approximately 345 facilities between what the CUPA has reported in its latest inspection summary report for Fiscal Year 2004-2005, which is 589 facilities, and the total number of businesses manifesting off hazardous waste with active EPA ID numbers listed in the Department's Hazardous Waste Tracking System, which is 935 facilities.</p> <p>Although improvement has been made since the last evaluation, further improvement can still be made. For instance, Advanced Auto Care Center located at 1641 Markley Avenue in West Sacramento was not identified in the CUPA's date base; however, the facility is active. After identifying any unlisted facilities, the CUPA shall complete inspections of all facilities including tiered permitted facilities within its three year inspection cycle.</p>	<p>Additional resources committed to the generator program.</p>	<p>January 1, 2007</p>
4	<p>As required by HSC 25187.8(b), a facility which receives a notice to comply pursuant to subdivision (a) shall not have more than 30 days from the date of receipt of the notice to comply in which to achieve</p>	<p>Either a re-inspection report or a return to compliance certificate is required.</p>	

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	compliance with the permit conditions, rule, regulation, standard, or other requirement cited on the notice to comply. Within five working days of achieving compliance, an appropriate person who is an owner or operator of, or an employee at, the facility shall sign the notice to comply and return it to the department representative or to the authorized local officer or agency, as the case may be, which states that the facility has complied with the notice to comply. A false statement that compliance has been achieved is a violation of this chapter pursuant to Section 25191. For instance, no return to compliance certificate could be found for the inspection conducted on October 11, 2005 at Double M Trucking located at 710 Dutton Street in Winters, CA.		Immediately
5	The CUPA is approving plot plans without all of the required elements. Monitoring plans are not reviewed or updated when requirements change.	Ensure that the plot plans have all of the required elements: sensor and equipment locations, tank annular space, sumps, dispenser pans, spill containers, or other secondary containment areas; mechanical or electronic line leak detectors; and in-tank liquid level probes (if used for leak detection). etc. Review the monitoring plans when regulation changes occur to determine if an update to the plan is required and that the facility is in compliance with the standard, if required.	1 year
6	The CUPA has not reviewed their latest Area Plan (2001) within 36 months and made any necessary changes. The CUPA did contract out to another Yolo County Agency. However, the agency was not able to complete the project and nothing has been done since to complete the review of and update to their Area Plan. During the February 2000 CUPA evaluation, the	The CUPA will conduct a complete review of their Area Plan and make any necessary changes.	1 year

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	CUPA was found to not have updated their Area Plan within 36 months of completing the 1995 edition.		
7	The CUPA has not established a procedure necessary to implement a dispute resolution between the CUPA and stationary sources.	The CUPA will develop dispute resolution procedures.	April 1, 2006
8	The CUPA is not inspecting all Business Plan facilities within their jurisdiction at least once every three years. The CUPA is only meeting 22% of their mandated frequency over the last three years – FY 02/03 (234 Inspections (I)/915 facilities (F)), FY 03/04 (146I/916F), FY 04/05 (249I/1022F). See observations for previous evaluations' deficiency for not meeting Business Plan inspection frequency.	The CUPA will develop a mechanism or fine- tune the current one to ensure that all facilities within their jurisdiction are inspected at least every three years	July 1, 2006 Jan 1, 2007
9	The CUPA is not inspecting all Cal ARP Program stationary sources within their jurisdiction at least every three years. The CUPA is only meeting 11.5% of their mandated frequency over the last three years – FY 02/03 (0 Inspections (I)/16 stationary sources (SS)), 03/04 (3I/16SS), 04/05 (1I/14SS). See observations for previous evaluations of the CalARP Program.	The CUPA will develop a mechanism or fine- tune the current one to ensure that all stationary sources within their jurisdiction are inspected at least once every three years	July 1, 2006 Jan 1, 2007

CUPA Representative

Joseph B. Sarazin
(Print Name)

Joseph B. Sarazin REHS
(Signature)

Evaluation Team Leader

Karen Taylor
(Print Name)

Karen Taylor
(Signature)

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PROGRAM OBSERVATIONS AND RECOMMENDATIONS

1. **Observation:** In FY 04/05, the number of regulated HMBP facilities in Yolo County has increased from 916 in FY 03/04 to 1022. Despite this increase in workload, the CUPA has improved its routine inspection frequency at HMBP facilities from 210 inspections in FY 03/04 (or 23% of regulated businesses for the FY) to 315 inspections in FY 04/05 (or 31% of regulated businesses for the FY).

Recommendation: Continue to improve on the inspection frequency for this element.

2. **Observation:** For UST facilities in FY 04/05, Yolo County has recorded 105 regulated businesses inspected and 97 routine inspections out of 120 facilities (or 81% of regulated businesses routinely inspected). This is an improvement from FY 03/04 where 83 regulated businesses were inspected and 80 out of 112 businesses (or 71%) were routinely inspected.

Recommendation: Continue to improve on the inspection frequency for this element to meet Yolo County's goal of inspecting all UST facilities annually.

3. **Observation:** The CUPA has been communicating with the Building Planning Departments in Yolo County to find out if more businesses are subject to the Unified Program elements. The response from the Building Planning Departments has been inconsistent as 2 of the Building Planning Departments do not respond to the CUPA at all.

Recommendation: Plan to meet with the Building Planning Departments to discuss and implement the collection of business documentation necessary for the Unified Program.

4. **Observation:** As stated by Jeff Pinnow, the CUPA has exhausted a lot of time resolving the ongoing issue of rail tank car storage of hazardous materials at Valero Refining Company.

Recommendation: Refer to Chapter 6.95 HSC 25503.7 (a) When any hazardous material contained in any rail car, rail tank car, rail freight container, marine vessel, or marine freight container remains within the same railroad facility, marine facility, or business facility for more than 30 days, or a business knows or has reason to know that any rail car, rail tank car, rail freight container, marine vessel, or marine freight container containing any hazardous material will remain at the same railroad facility, marine facility, or business facility for more than 30 days, the hazardous material is deemed stored at that location for purposes of this chapter and subject to the requirements of this chapter.

5. **Observations:** With the exception of the annual survey (Annual Hazardous Materials Questionnaire) sent to county fire agencies, there was little indication that the CUPA is coordinating and corresponding with the fire departments about Business Plan documentation.

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Recommendations: The CUPA should establish a mechanism to confirm that they sent each business plan to the fire departments within 15 days after each business submits the required plans and inventory statements. Additionally, they should show that the fire departments received the plans in a timely manner and indicate whether the fire chiefs require more information to be included in the plans and inventory statements.

6. **Observation:** The CUPA does not meet with fire agencies on a regular basis to coordinate or resolve issues involving the Unified Program.

Recommendation: The CUPA should participate in fire agency chiefs' meetings or establish a mechanism to schedule regular meetings with the fire chiefs in the county.

7. **Observations:** During the introductions, Jeff Pinnow mentioned that the department has improved their data collection and data management systems. They are now using ENVISION, a computer database program and SIRE a computerized document management program to manage facility data, inspections, and information management. Although, the CUPA has a well developed Business Plan program in terms of automation, the actual hard copy files are being disposed of after electronically transforming and scanning them into computer database and document management format.

Recommendations: Original and hard copy files should be kept and maintained for a period of time for several reasons. Below are some examples:

1. In case of litigation, a court may subpoena original documents.
2. Power outage or computer failure.
3. Undetected or new computer virus introduced in the system.
4. Limitation of terminals for the public to access information electronically.
5. Natural disasters that may render computer systems inaccessible.

8. **Observation:** The CUPA was able to demonstrate that most complaints which were referred by DTSC from January 1, 2003 to February 1, 2006 were investigated. Follow-up documentation could be found for Complaints Nos. 03-0503-0333, 04-0504-0331, 04-0604-0365, 05-0605-0309, 04-1204-0689, 04-0104-0047, 05-0405-0183, 04-0404-0240, 03-1103-0725, 04-1004-0607, 03-0403-0230, and 04-0504-0328, but not for Complaint Nos. 04-0104-0066.

Recommendation: Keep up the good work. Ensure that all complaints are being received by the CUPA from DTSC by providing the e-mail address of the person who should receive complaints to [\[slaney@dtsc.ca.gov\]](mailto:slaney@dtsc.ca.gov) [\[dstuck@dtsc.ca.gov\]](mailto:dstuck@dtsc.ca.gov), complaint coordinator. Investigate and document all complaints referred. Investigation does not always entail inspection, as many issues may be resolved by other means such as a phone call. In any instance, it is suggested that all investigations be documented, either by inspection report or by "note to file" and placed in the facility file. Please keep up the good work and continue to notify the complaint coordinator of the disposition of all complaints.

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9. **Observation:** The tank owners are not required by the CUPA to complete new UST-Facility and UST-Tank Forms when the forms are revised to include additional reporting requirements, therefore the forms submitted prior to 1999 may not be complete.

Recommendation: Provide revised UPUST forms to owners for updated information.

10. **Observation:** Many of the program forms used are not up-to-date with the new requirements. Installation application forms, checklists, and inspection forms do not appear to be updated with VPH requirements.

Recommendation: Revise the forms to incorporate new legal requirements.

11. **Observation:** The inspection checklist is not detailed enough to provide an accurate compliance picture. While many of the elements are inclusive in a general category of compliance, in order to ensure that the majority of compliance elements are covered in the inspection it should be a separate violation. SOC Compliance items are not detailed on the inspection checklist. There is no mechanism to indicate that an item has been inspected on the checklist.

Recommendation: Revise the inspection checklist to include a more comprehensive list of violations, such as Sensors are in the correct location; Sensors are the correct type for the type of monitoring; Secondary containment tests are current and passing results achieved, etc. Detail the SOC compliance items. Include a space or checkbox to show that the item has been inspected.

12. **Observation:** The information for Report 6 SOC requirements is not tracked.

Recommendation: Develop a mechanism to track SOC compliance for completing Report 6. Base the determination on compliance with the SOC specific elements.

13. **Observation:** On the field inspection evaluation the inspector completed the inspection report to indicate that there were no violations; however, the sensors located at the turbine sump and at the UDC did not shutdown the turbine, as required. Although the item was corrected, the violation should still be noted. To indicate this, would be a way of determining a pattern of violation. For SOC determination the violation must be noted, regardless if it is corrected at the time of inspection or not.

Recommendation: Indicate on the inspection form all violations. If they are corrected at the time of inspection, indicate that it is corrected. Show both the violation and the correction.

14. **Observation:** There are no paper files, and currently the inspector does not have a way to compare the information in the agency files vs. the facility files (UPUST forms, monitoring/response plan, etc.) or verify that the information is current. The SWRCB did not observe that these documents were looked at to see if the facility files were accurate for the facility.

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Recommendation: Until the electronic forms are available to field personnel, print copy of documents prior to inspection for use in the field, or develop a mechanism to verify that the information in the file is current and the same as what is in the facility file.

15. **Observation:** The CUPA and the County Agricultural Commissioner have a memorandum of understanding (agreement) for the Commissioner's staff to conduct hazardous material inspections of pesticide handlers. The CUPA provides the Commissioner's staff with facility and other necessary information to conduct those inspections of agricultural handlers. Once conducted, the inspection documentation is brought to and left with the CUPA. The CUPA has the responsibility to conduct follow-up inspections and enforcement to ensure any facilities observed to be non-compliant with the business plan program return to compliance. The CUPA does not regularly train the Commissioner's staff on how to conduct inspections, covering all aspects of the Business Plan. The CUPA and the Agricultural Commissioners office do communicate on a non-regular schedule to maintain coordination through implementation discussion. The CUPA receives and reviews all the inspection reports for these businesses, ensuring that reports are complete. However, no other measures are taken to ensure adequate performance of the inspectors.

Recommendation: Recommend that the CUPA:

- Periodically conduct joint or oversight inspections with the inspectors from the Agricultural Commissioners Office. This will provide first-hand verification that the inspectors are conducting adequate inspections at these facilities and whether or not they are meeting the established performance expectations set forth for the Unified Program
 - Regularly meet with the Agricultural Commissioner's Office to ensure and maintain coordination for the discussion of implementation issues.
16. **Observation:** The CUPA has a PA, the West Sacramento Fire Department to conduct inspections at facilities in West Sacramento that are regulated solely under the Business Plan program and/or as recycle only hazardous waste generators. The CUPA provides the Fire Department with facility and other necessary information to conduct those inspections. Once conducted, the inspection documentation is brought to and left with the CUPA. The CUPA has the responsibility to conduct follow-up inspections and enforcement to ensure any facilities observed to be non-compliant with either program return to compliance. The CUPA does not regularly train the Fire Department's staff on how to conduct inspections, covering all aspects of the Business Plan. The CUPA and the Fire Department do communicate on a non-regular schedule to maintain coordination through implementation discussion. The CUPA receives and reviews all the inspection reports for these businesses, ensuring that reports are complete. However, no other measures are taken to ensure adequate performance of the inspectors.

Recommendation: Recommend that the CUPA:

- Periodically conduct joint or oversight inspections with the inspectors from the West Sacramento Fire Department. This will provide first-hand verification that the inspectors are conducting adequate inspections at these facilities and whether

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or not they are meeting the established performance expectations set forth for the Unified Program

- Regularly meet with the Fire Department to ensure and maintain coordination for the discussion of implementation issues.

17. Observation: During the February 2000 CUPA evaluation, the CUPA was found to not be inspecting all the businesses subject to the business plan program for compliance at least once every three years. The CUPA responded to this deficiency as follows: "It took a longer time to establish a fee schedule for CUPA than anticipated during the early stage of implementation. This in turn delayed the hiring of staff to conduct inspections. Yolo County Environmental Health has increased staff assigned to the Unified Program by 2.5 professional staff members since the evaluation was completed. These staff members are completing training in each of the program elements and have started conducting routine inspections. An inspection schedule has been developed that will result in triennial inspections for all facilities except those with underground storage tanks which will be inspected annually.

On 3/27/01, Yolo County CUPA provided OES with further clarification on the above deficiency: You indicated that it did not appear that we addressed this issue in our response to the evaluation report.

Our response under Part A: Unified Program Implementation was intended to address this issue.

"Comment/Action Plan: It took a longer time to establish a fee schedule for CUPA than anticipated during the early stage of implementation. This in turn delayed the hiring of staff to conduct inspections. Yolo County Environmental Health has increased staff assigned to the Unified Program by 2.5 professional staff members since the evaluation was completed. These staff members are completing training in each of the program elements and have started conducting routine inspections. An inspection schedule has been developed that will result in triennial inspections for all facilities except those with underground storage tanks which will be inspected annually."

We are now conducting routine Business Plan inspections. By July 1, 2001 we expect to be conducting inspections at the required frequency to meet the triennial mandated inspection frequency for the Business Plan Program. This is made possible due to:

1. Our new staff will complete basic training for the CUPA and Emergency Response Programs in May. At this time they will be completing inspections at the required frequency for their assigned facilities.
2. We are entering into an agreement with the West Sacramento Fire Department to conduct Business Plan inspections for selected facilities in West Sacramento. This will reduce the inspection load on the CUPA staff further insuring that we will be able to conduct inspections at the rate necessary to meet the mandated inspection schedule. West Sacramento Fire will begin conducting inspections in April 2001. The CUPA will apply to the Secretary of

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CalEPA to certify the West Sacramento Fire Department as a Participating Agency once procedures for adding a Participating Agency have been developed by the Secretary."

During the November 2002 CUPA evaluation, the CUPA was found to not be inspecting all the businesses subject to the business plan program for compliance at least once every three years. The CUPA responded to this deficiency as follows: "the CUPA assumed the responsibility for this program from the former PA. To implement this program element all program policies, forms, and procedures had to be developed. Budgets had to be prepared and adopted, staff hired and trained. New data processing procedures were developed and implemented and facility data including hazardous material inventories entered. Both our hard and electronic file storage systems were re-designed to meet program needs. This was complicated by the Anthrax emergency that diverted CUPA's efforts for a several-month period. The program infrastructure was completed by mid 2002. Staff was hired and inspections initiated as new staff trained. Recently we completed an agreement (attached) with the West Sacramento Fire Department (approved by the Board of Supervisors April 22, 2003). The Fire Department will conduct some of the Hazardous Material program inspections within the City. With procedures now in place, staff nearly trained, and inspections beginning July 1, 2003 by West Sacramento we anticipate meeting the mandated inspection frequency in the 2003/2004 reporting year. During the 2002/2003 year the CUPA anticipates inspecting approximately 80 to 90 percent of facilities necessary to meet the mandated inspection frequency."

Recommendation: See Preliminary Correction Action for Deficiency of not inspecting all the businesses subject to the business plan program for compliance at least once every three years.

18. **Observation:** During the February 2000 CUPA evaluation, the CalARP program was evaluated to identify the CUPA's current program implementation status. At the time of the evaluation, the CUPA had a contracted consultant who was knowledgeable of the program requirements and had been receiving federal and state Risk Management Plans (RMPs).

During the November 2002 CUPA evaluation, the CUPA was found not to be implementing the CalARP program. The CUPA responded to this deficiency as follows: "the CUPA began implementing the CalARP program prior to the evaluation by hiring a staff member (Mary Le) for this purpose. We reviewed facilities in mid-2002 based on their inventories and original CalARP registration and RMP submissions to determine which were still subject to the program. In September of 2002 the CUPA entered billing data into our database and began assessing and collecting CalARP surcharges from appropriate facilities. The CUPA is transmitting the CalARP surcharges collected to the State quarterly. We have also started reviewing RMP's and other documents transferred to us from the former PA for technical content.

Since the evaluation two staff members (Jeff Pinnow and Mary Le) have received additional program technical training (by USEPA in December and during the CUPA Conference in February). We have determined that all identified facilities have submitted RMP's and the

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required registration information. Inspection forms and many of the program policies and procedures have been drafted. Mary is scheduled to accompany Solano County staff at one of their facilities during an inspection in late May. We expect to begin audits/inspections of Yolo County facilities in June or July and initiate a process to determine if there are facilities subject to the program that have not yet been identified.

Although we agree that this program has not been fully implemented we believe that the considerable progress we have made toward implementation of this program demonstrates satisfactory progress toward implementing this program element.”

The CUPA spent many hours the last fiscal year 05/06 in consultation with USEPA and DOT regarding Valero Refining Company's storage of millions of gallons of Butane in railroad cars in their County and requiring the company to comply with the CalARP program requirements. A result of the consultation, it was discovered that no federal laws and regulations require the company to develop and submit an RMP.

Recommendation: See Preliminary Correction Action for Deficiency of not inspecting all the stationary sources subject to the CalARP program for compliance at least once every three years.

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EXAMPLES OF OUTSTANDING PROGRAM IMPLEMENTATION

1. Administrative Enforcement Actions (AEO) for FY 04/05 has increased from FY 03/04. In late 2004, the CUPA attempted to identify facilities that were overdue submitting the required HMBP updates. This resulted in 7 Administrative Enforcement Actions taken with penalties of \$250.00 each. 5 AEOs were taken at Hazardous Waste facilities in 2005. Three of the facilities were at UC Davis and two at auto dismantlers. The penalties collected at these sites ranged from \$5,000.00 to \$12,000.00 apiece. These enforcement efforts have been effective in compelling compliance at other facilities in the county. The CUPA has implemented 25 enforcement actions in FY 04/05. Some examples include:
 - Business: Metro Auto Dismantling
Case Type: AEO
Penalty Amount: \$5000
 - Business: M & M Salvage
Case Type: AEO
Penalty Amount: \$11,500
 - Business: UC Davis OPS & Main
Case Type: AEO
Penalty Amount: \$12,200
 - Business: Sanam ARCO
Case Type: AEO
Penalty Amount: \$2000
2. The CUPA developed a procedure manual for the completion of daily time entries to Envision. The manual was completed in June 2004 and the staff is now trained using the manual. Since the manual's completion, daily entries and violation tracking has become more consistent. This has made conducting follow-up activities, preparing reports, and identifying trends more efficient.
3. In February 2005, The CUPA started utilizing the SIRE Document Management System for data management. This system allows staff to scan and file all documents electronically instead of relying on paper files. CUPA documents are imported electronically, in their native format, or scanned as .tif files. The system allows staff to efficiently search for CUPA documents and to send a large amount of information to others quickly and easily. The system also allows staff to secure information such as chemical location and the HMBP maps from the public more easily.
4. The CUPA has consolidated its inspection efforts by creating an agreement with the County Agricultural Commissioner to conduct farm inspections and an agreement with the City of West Sacramento for inspections of specific facilities within that city.
5. The CUPA has fully implemented the Single Fee System. It incorporates all recurrent Unified Program fees into one annual fee statement. The Single Fee Invoice includes all annual CUPA fees for all of the Unified Program elements, including the Agricultural Commissioner for conducting

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inspections of farms. State accounting records indicate that remitted CUPA fees recorded on summary report 2 for the past 3 fiscal years is accurate and up-to-date.

6. The Yolo County Health Department has developed a website to assist businesses in obtaining all the proper permits in order to operate by service and/or industrial classification.
7. During the November 2002 evaluation, the CUPA was found to not be forwarding Business Plan information to local agencies with shared responsibilities for protection of the public health and safety and the environment within 15 days of receipt and confirmation. The CUPA responded to this deficiency as follows: "the CUPA was currently providing this information to fire departments on a quarterly basis. CUPA representatives stated that the fire departments prefer to receive the business plan information in batches every three months rather than individually within 15 days of receipt and confirmation." The CUPA met with the Chiefs of the 17 fire protection districts in Yolo County and revised the procedures to account for how this information is to be shared. Yearly, the CUPA is surveying the Fire Agencies to determine which hazardous materials information they want to receive from the CUPA on a quarterly basis.

